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Attorneys for Plaintiff

Johnson & Johnson Health Care Systems Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JOHNSON & JOHNSON

HEALTH CARE SYSTEMS INC.,

Plaintiff,

v.

**SAVE ON SP, LLC, EXPRESS
SCRIPTS, INC., AND ACCREDO
HEALTH GROUP, INC.,**

Defendants.

:

Civil Action No. 22-2632(JKS)(CLW)

:

Hon. Jamel K. Semper, U.S.D.J.

:

Hon. Cathy L. Waldor, U.S.M.J.

:

Hon. Freda L. Wolfson, Special Master

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NOTICE OF MOTION TO SEAL

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COUNSEL:

PLEASE TAKE NOTICE that on March 17, 2025 at 9:00 a.m., or as soon thereafter as counsel may be heard, the undersigned attorneys for plaintiff Johnson & Johnson Health Care Systems Inc. (“JJHCS”) will apply before the Honorable Freda L. Wolfson, Special Master at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an Order:

- (a) Permanently maintaining under seal the letters and supporting exhibits filed by the parties in connection with the Motion of Defendant Save On SP, LLC (“SaveOnSP”) to Compel JJHCS to run searches of the custodial files of Michael Ingham, dated January 3, 2025, with related briefing dated January 17 and January 28, 2025 (ECF Nos. 488, 494 & 513), filed January 7, January 17, and February 5, 2025 (the “Motion to Compel”); and
- (b) Permitting JJHCS to file the proposed public versions of ECF Nos. 488, 494 & 513, attached as Exhibits A, B, and C to the Declaration of Jeffrey J. Greenbaum submitted in support of this motion (“Greenbaum Declaration”).

PLEASE TAKE FURTHER NOTICE that in support of this motion, JJHCS will rely on the accompanying Greenbaum Declaration and the index in support of this motion. A proposed form of Order is also attached.

PLEASE TAKE FURTHER NOTICE that pursuant to L. Civ. R. 7.1(d)(4), no brief is necessary inasmuch as the application presents issues that are a matter of familiarity to the Court.

PLEASE TAKE FURTHER NOTICE that SaveOnSP does not object to the relief requested.

Respectfully submitted,

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Dated: February 19, 2025